

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Mark Skolnick (MS- 9426)
PLATZER, SWERGOLD, KARLIN,
LEVINE, GOLDBERG & JASLOW, LLP
1065 Avenue of the Americas, 18th Floor
New York, NY 10018
Tel: (212) 593-3000
Attorneys for Plaintiffs,
Portage World-Wide, Inc. and
Su-Hwei Lin

Portage World-Wide, Inc., and
Su-Hwei Lin

Plaintiffs,

-against-

Manhattan Portage, Ltd. and
John Peters John Wong and
Service Retail Unlimited, Inc.

Defendants.

Civil Action No.

08 Civ. 1660 (JGK)

REPLY TO COUNTERCLAIMS

PLAINTIFFS, Portage World-Wide, Inc. and Su-Hwei Lin, by their attorneys, Platzer, Swergold, Karlin, Levine, Goldberg & Jaslow, LLP, as and for their Reply to the Counterclaims herein, allege as follows:

1. Admit the allegations contained in paragraph 1 of the Answer With Counterclaims.
2. Admit the allegations contained in paragraph 2 of the Answer With Counterclaims.
3. Admit the allegations contained in paragraph 3 of the Answer With Counterclaims.
4. Admit, on information and belief, the allegations contained in paragraph 4 of the Answer With Counterclaims.
5. Admit the allegations contained in paragraph 5 of the Answer With Counterclaims.
6. Admit the allegations contained in paragraph 6 of the Answer With Counterclaims.
7. Admit the allegations contained in paragraph 7 of the Answer With Counterclaims.
8. Admit the allegations contained in paragraph 8 of the Answer With Counterclaims.

9. Deny the allegations contained in Paragraph 9 of the Answer With Counterclaims .

10. Admit the allegations contained in paragraph 10 of the Answer With Counterclaims.

11. Deny the allegations contained in Paragraph 11 of the Answer With Counterclaims.

12. Repeat and reallege the responses contained in paragraphs 1 through 11 hereof in reply to the allegations contained in paragraph 12 of the Answer With Counterclaims.

13. Deny the allegations contained in Paragraph 13 of the Answer With Counterclaims.

14. Deny the allegations contained in Paragraph 14 of the Answer With Counterclaims.

15. Deny the allegations contained in Paragraph 15 of the Answer With Counterclaims.

16. Deny the allegations contained in Paragraph 16 of the Answer With Counterclaims.

17. Repeat and reallege the responses contained in paragraphs 1 through 16 hereof in reply to the allegations contained in paragraph 17 of the Answer With Counterclaims.

18. Admit that the Court has the jurisdiction alleged in paragraph 18 of the Answer With Counterclaims.

19. With respect to the allegations contained in paragraph 19 of the Answer With Counterclaims, admit that the disputes raised in the instant litigation relate, in part, to the Settlement Agreement and the License Agreement.

20. With respect to paragraph 20 of the Answer With Counterclaims, admit that defendants seek a declaration by the Court as requested.

21. Repeat and reallege the responses contained in paragraphs 1 through 20 hereof in reply to the allegations contained in paragraph 20 of the Answer With Counterclaims.

22. Admit that the Court has the jurisdiction alleged in paragraph 20 of the Answer With Counterclaims.

23. With respect to the allegations contained in paragraph 23 of the Answer With Counterclaims, admit that the disputes raised in the instant litigation relate, in part, to plaintiffs'

contention that Wong does not have the right to use the Manhattan Portage Trademark in the manner alleged in the complaint.

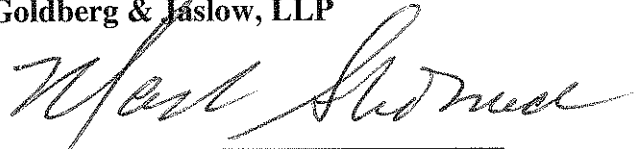
24. With respect to paragraph 24 of the Answer With Counterclaims, admit that Wong seeks a declaration by the Court as requested.

WHEREFORE, Plaintiffs pray for judgment against defendants/counterclaim plaintiffs as follows:

1. Dismissing the Counterclaims,
2. Awarding plaintiffs the costs and disbursements of this action,
3. Together with such other relief as the Court deems just and proper.

New York, New York
Dated: July 22, 2008

Respectfully Submitted,
**Platzer, Swergold, Karlin, Levine
Goldberg & Jaslow, LLP**



Mark Skolnick (MS- 9426)

Attorneys for Plaintiffs
Portage World-Wide, Inc. and Su-Hwei Lin
1065 Avenue of the Americas
New York, New York 10018
Tel: (212) 593-3000